

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 18-150 (dwf/HB)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	MOTIONS <i>IN LIMINE</i> NOS. 1-5
)	
MICHAEL HARI,)	
)	
Defendant.)	

The United States of America by and through its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Assistant United States Attorneys Julie Allyn, Allison Ethen, and John Docherty, hereby make the following Motions *in Limine* regarding the above-entitled matter.

1. Precluding the defense, in the presence of the jury, from offering or referring to in any way, hearsay statements of the defendant.
2. To sequester potential witnesses, with the exception of the case agents.
3. Precluding the defense, in the presence of the jury, from referring to the potential penalty the defendant faces if convicted of the crimes alleged in the Indictment.
4. Limiting defense cross-examination of any witness regarding prior bad acts or convictions of the witness to only those matters which are permitted under Federal Rules of Evidence 608 and 609 and precluding the defendant from referring to any alleged prior bad act or conviction of a witness in the presence of the jury until the court has determined

the propriety of the proposed cross-examination or the admissibility of the proffered evidence.

5. Requiring the defense to make any dispositive motion, other than a motion under Fed. R. Crim. P. 29, before jeopardy attaches with the swearing of the jury, as required by Fed. R. Crim. P. 12.

Dated: September 29, 2020

Respectfully Submitted,

ERICA H. MacDOLAND
United States Attorney

/s/ Julie E. Allyn

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